

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

SUPPRESSED
FILED

APR 25 2019

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

JALON MOORE, A/K/A "LONNIE,"
LARRY RHINES,
and GARRY JOHNSON, A/K/A "GEE,"
A/K/A "GEE MBK,"

Defendants.

4:19CR325 JAR/DDN

INDICTMENT

COUNT ONE

The Grand Jury charges that:

Beginning on a date unknown to the grand jury, but including January 9, 2019, and continuing up through and including the date of this indictment, in the Eastern District of Missouri and elsewhere,

**JALON MOORE, A/K/A "LONNIE,"
LARRY RHINES,
and GARRY JOHNSON, A/K/A "GEE,"
A/K/A "GEE MBK,"**

the Defendants herein, did combine, conspire, confederate, and agree with each other and with other persons known and unknown to the grand jury, to commit offenses against the United States of America, that is, the crime of obstructing, delaying, or affecting commerce or the movement of any article or commodity in commerce, or attempting to do so, by robbery of one or more commercial establishments engaged in interstate or foreign commerce and in the business of buying and selling articles and commodities that have been previously transported in

interstate or foreign commerce, in violation of Title 18, United States Code, Sections 1951(a) and 2, and that during the course thereof, one or more of such persons committed an overt act to effect the object of the conspiracy.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT TWO

The Grand Jury further charges that:

Beginning on a date unknown to the grand jury, but including January 9, 2019, and continuing up through and including the date of this indictment, in the Eastern District of Missouri and elsewhere,

**JALON MOORE, A/K/A "LONNIE,"
LARRY RHINES,
and GARRY JOHNSON, A/K/A "GEE,"
A/K/A "GEE MBK,"**

the Defendants herein, did combine, conspire, confederate, and agree with each other and with other persons known and unknown to the grand jury, to commit an offense or offenses against the United States of America, that is, the crime of knowingly possessing and brandishing one or more firearms, including: (1) a .40 or .45 caliber black semi-automatic handgun; (2) a 9mm black and silver pistol; and (3) a pistol grip, short barrel shotgun, in furtherance of a crime or crimes of violence for which they may be prosecuted in a court of the United States, that is, obstructing, delaying, or affecting commerce or the movement of any article or commodity in commerce, or attempting to do so, by robbery of one or more commercial establishments engaged in interstate or foreign commerce and in the business of buying and selling articles and commodities that have been previously transported in interstate or foreign commerce.

In violation of Title 18, United States Code, Section 924(o).

COUNT THREE

The Grand Jury further charges that:

On or about January 9, 2019, in the City of St. Louis within the Eastern District of Missouri,

**JALON MOORE, A/K/A "LONNIE,"
LARRY RHINES,
and GARRY JOHNSON, A/K/A "GEE,"
A/K/A "GEE MBK,"**

the Defendants herein did obstruct, delay, or affect commerce or the movement of any article or commodity in commerce or attempt to do so by robbery of the Mack Bar and Grill, located at 4615 Macklind, St. Louis, Missouri, which is a commercial establishment engaged in interstate or foreign commerce and in the business of buying and selling articles and commodities that have been previously transported in interstate or foreign commerce.

In violation of Title 18, United States Code, Section 1951(a)(a).

COUNT FOUR

The Grand Jury further charges that:

On or about January 9, 2019, in the City of St. Louis within the Eastern District of Missouri,

**JALON MOORE, A/K/A "LONNIE,"
LARRY RHINES,
and GARRY JOHNSON, A/K/A "GEE,"
A/K/A "GEE MBK,"**

the Defendants herein knowingly possessed and brandished one or more firearms, in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is, obstructing, delaying, or affecting commerce by robbery, or attempting to do so, as charged in Count Three herein.

In violation of Title 18, United States Code, Section 924(c)(1)(A) and punishable under

Sections 924(c)(1)(A)(i) or 924(c)(1)(A)(ii).

COUNT FIVE

The Grand Jury further charges that:

On or about February 9, 2019, in the City of St. Louis within the Eastern District of Missouri,

**JALON MOORE, A/K/A "LONNIE,"
LARRY RHINES,
and GARRY JOHNSON, A/K/A "GEE,"
A/K/A "GEE MBK,"**

the Defendants herein did obstruct, delay, or affect commerce or the movement of any article or commodity in commerce or attempt to do so by robbery of Jimmy John's, located at 6459 Chippewa Street, St. Louis Missouri, and which is a commercial establishment engaged in interstate or foreign commerce and in the business of buying and selling articles and commodities that have been previously transported in interstate or foreign commerce.

In violation of Title 18, United States Code, Section 1951(a)(a).

COUNT SIX

The Grand Jury further charges that:

On or about February 9, 2019, in the City of St. Louis within the Eastern District of Missouri,

**JALON MOORE, A/K/A "LONNIE,"
LARRY RHINES,
and GARRY JOHNSON, A/K/A "GEE,"
A/K/A "GEE MBK,"**

the Defendants herein knowingly possessed and brandished one or more firearms, in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is, obstructing, delaying, or affecting commerce by robbery, or attempting to do so, as charged in Count Five herein.

In violation of Title 18, United States Code, Section 924(c)(1)(A) and punishable under Sections 924(c)(1)(A)(i) or 924(c)(1)(A)(ii).

COUNT SEVEN

The Grand Jury further charges that:

On or about February 17, 2019, in the City of St. Louis within the Eastern District of Missouri,

**JALON MOORE, A/K/A "LONNIE,"
and LARRY RHINES,**

the Defendants herein did obstruct, delay, or affect commerce or the movement of any article or commodity in commerce or attempt to do so by robbery of Subway, located at 1151 South Kingshighway Boulevard, St. Louis, Missouri, and which is a commercial establishment engaged in interstate or foreign commerce and in the business of buying and selling articles and commodities that have been previously transported in interstate or foreign commerce.

In violation of Title 18, United States Code, Section 1951(a)(a).

COUNT EIGHT

The Grand Jury further charges that:

On or about February 16, 2019, in the City of St. Louis within the Eastern District of Missouri,

**JALON MOORE, A/K/A "LONNIE,"
and LARRY RHINES,**

the Defendants herein knowingly possessed and brandished one or more firearms, in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is, obstructing, delaying, or affecting commerce by robbery, or attempting to do so, as charged in Count Seven herein.

In violation of Title 18, United States Code, Section 924(c)(1)(A) and punishable under

Sections 924(c)(1)(A)(i) or 924(c)(1)(A)(ii).

COUNT NINE

The Grand Jury charges that:

On or about March 18, 2019, in the City of St. Louis within the Eastern District of Missouri,

**JALON MOORE, A/K/A "LONNIE,"
LARRY RHINES,
and GARRY JOHNSON, A/K/A "GEE,"
A/K/A "GEE MBK,"**

the Defendants herein did obstruct, delay, or affect commerce or the movement of any article or commodity in commerce or attempt to do so by robbery of Panda Express, located at 4400 Hampton Avenue, St. Louis, Missouri, and which is a commercial establishment engaged in interstate or foreign commerce and in the business of buying and selling articles and commodities that have been previously transported in interstate or foreign commerce.

In violation of Title 18, United States Code, Section 1951(a)(a).

COUNT TEN

The Grand Jury further charges that:

On or about March 18, 2019, in the City of St. Louis within the Eastern District of Missouri,

**JALON MOORE, A/K/A "LONNIE,"
LARRY RHINES,
and GARRY JOHNSON, A/K/A "GEE,"
A/K/A "GEE MBK,"**

the Defendants herein knowingly possessed and brandished one or more firearms, in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is, obstructing, delaying, or affecting commerce by robbery, or attempting to do so, as charged in Count Nine herein.

In violation of Title 18, United States Code, Section 924(c)(1)(A) and punishable under Sections 924(c)(1)(A)(i) or 924(c)(1)(A)(ii).

COUNT ELEVEN

The Grand Jury further charges that:

On or about March 21, 2019, in the City of St. Louis within the Eastern District of Missouri,

**JALON MOORE, A/K/A "LONNIE,"
and LARRY RHINES,**

the Defendants herein did obstruct, delay, or affect commerce or the movement of any article or commodity in commerce or attempt to do so by robbery of Sprint, located at 5441 Hampton Avenue, St. Louis, Missouri, and which is a commercial establishment engaged in interstate or foreign commerce and in the business of buying and selling articles and commodities that have been previously transported in interstate or foreign commerce.

In violation of Title 18, United States Code, Section 1951(a)(a).

COUNT TWELVE

The Grand Jury further charges that:

On or about March 21, 2019, in the City of St. Louis within the Eastern District of Missouri,

**JALON MOORE, A/K/A "LONNIE,"
and LARRY RHINES,**

the Defendants herein knowingly possessed and brandished one or more firearms, in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is, obstructing, delaying, or affecting commerce by robbery, or attempting to do so, as charged in Count Eleven herein.

In violation of Title 18, United States Code, Section 924(c)(1)(A) and punishable under

Sections 924(c)(1)(A)(i) or 924(c)(1)(A)(ii).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 924 and 981(a) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 1951(a), as set forth in Counts One, Three, Five, Seven, Nine and Eleven, the defendants shall forfeit to the United States of America any property, real or personal, constituting or derived from any proceeds traceable to said violation, and any firearm or ammunition involved in or used or intended to be used in such violation.
2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said offenses as set forth in Counts One, Three, Five, Seven, Nine and Eleven.
3. Pursuant to Title 18, United States Code, Sections 924(d) and Title 28, United States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 924, as set forth in Counts Two, Four, Six, Eight, Ten and Twelve, the defendants shall forfeit to the United States of America any firearm or ammunition involved in or used in any knowing such violation.
4. If any of the property described above, as a result of any act or omission of the defendants:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property which cannot be divided

without difficulty,
the United States of America will be entitled to the forfeiture of substitute property pursuant to
Title 21, United States Code, Section 853(p).

A TRUE BILL

FOREPERSON

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